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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

AREZOU MANSOURIAN; LAUREN
MANCUSO; NANCY NIEN-LI CHIANG;
CHRISTINE WING-SI NG; and all those
similarly situated,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE
UNIVERSITY OF CALIFORNIA AT DAVIS;
LAWRENCE "LARRY" VANDERHOEF;
GREG WARZECKA; PAM GILL-FISHER;
ROBERT FRANKS; and LAWRENCE
SWANSON,

Defendants.

CASE NO. S-03-2591 FCD EFB

CLASS ACTION

**STIPULATION AND [PROPOSED] ORDER
RE DISMISSAL OF CLAIMS OF
PLAINTIFF NANCY CHIANG**

1 WHEREAS, plaintiff NANCY NIEN-LI CHIANG (CHIANG) is one of the named plaintiffs in
2 this action, suing in her individual capacity only and not as a representative of the proposed class;

3 WHEREAS, plaintiff CHIANG makes no concessions regarding the adequacy or merits of the
4 claims asserted on her behalf in this action but, based upon changed circumstances, does not desire to
5 litigate those claims further;

6 WHEREAS the parties share a mutual desire to resolve plaintiff CHIANG's claims in this action
7 by the dismissal of those claims, in their entirety, and by the waiver of any right to costs or other relief
8 that defendants might seek from plaintiff CHIANG arising out of the filing or prosecution of this action
9 by her;

10 NOW, THEREFORE, plaintiff NANCY NIEN-LI CHIANG and defendants, through their
11 respective counsel, subject to the approval of this Court, hereby stipulate that:

12 1. Plaintiff CHIANG'S claims in this action shall be dismissed in their entirety, as against
13 each of the named defendants, with prejudice;

14 2. Defendants REGENTS OF THE UNIVERSITY OF CALIFORNIA, LARRY
15 VANDERHOEF, GREG WARZECKA, PAM GILL-FISHER, ROBERT FRANKS, LAWRENCE
16 SWANSON, and each of them, shall not seek costs or any other relief against plaintiff CHIANG, on
17 their own or through counsel, based upon the filing or prosecution of this action by her; Plaintiff
18 CHIANG and her counsel agree that any motion for fees and costs made by plaintiffs in this action will
19 not include those fees and costs for work done exclusively in furtherance of Plaintiff CHIANG's
20 claims.

21 3. During the pendency of this action in the District Court, plaintiff's counsel will advise
22 defendant's counsel of the last known address for plaintiff CHIANG. Defendants agree that any future
23 contact they make with plaintiff CHIANG during the pendency of this action shall be through the
24 undersigned counsel.

25 4. Defendants will withdraw their motion to dismiss plaintiff CHIANG's claim for

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damages, currently set for hearing on March 21, 2007. Defendants shall not continue or resume any efforts to obtain copies of plaintiff CHIANG's medical or mental health records.

DATED: March 19, 2007

Respectfully submitted,
THE STURDEVANT LAW FIRM
A Professional Corporation

By: /s/ Monique Olivier

MONIQUE OLIVIER
Attorneys for Plaintiffs

DATED: March 19, 2007

EQUAL RIGHTS ADVOCATES

By: /s/ Noreen Farrell

NOREEN FARRELL
Attorneys for Plaintiffs

DATED: March 19, 2007

PORTER, SCOTT, WEIBERG & DELEHANT


By: /s/ Nancy J. Sheehan

NANCY J. SHEEHAN
Attorneys for Defendants

* * *

IT IS SO ORDERED. The claims of plaintiff Nancy Nien-Li Chiang as against each of the defendants shall be dismissed with prejudice. The pending motion to dismiss plaintiff Chiang's damages claims, set for hearing on March 21, 2007, is off calendar. Defendants shall not take any further action to obtain copies of plaintiff Chiang's medical or mental health records. Each of the parties shall bear their own costs.

Dated: March 29, 2007.


FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE